

United States District Court  
For The Northern District of New York  
PLAINTIFF'S DEPOSITION DESIGNATIONS

Case No.: 20-CV-01194

Date: June 10, 2024

Presiding Judge: Hon. Frederick J. Scullin

Deponent	Date	Designation	Objections	Responses to Objections	Counter-Designations	Responses to Counter-Designations
Joel Dettmer	12/10/2021	15:2-5			14:25-15:11	
		17:11-20			17: 3-24	
		18:17-20			18:12-23	
		40:8-20				
		45:17-21	Object	This testimony is relevant because it shows Defendant Dettmer's understanding of Jefferson County's search policies at the time of the incident.		
		49:19-50:8				
		51:2-52:24			52:21-25	
		57:12-14				
		59:7-13				

<b>Deponent</b>	<b>Date</b>	<b>Designation</b>	<b>Objections</b>	<b>Responses to Objections</b>	<b>Counter-Designations</b>	<b>Responses to Counter-Designations</b>
Kristopher Spencer	12/17/2021	10:18-22				
		12:19-13:7				
		20:9-12				
		25:18-28:5			26:14-21	
		26:4-27:2			26:14-21	
		27:14-20				
		30:21-31:8	Relevance	This testimony is relevant because it provides context for where Ms. LeTray was held at the Jail on the night of the incident.		
		36:6-37:2			36:20-37:2	
		38:25-39:14			39:8-12	
		48:11-51:9			48:15-49:12	
		53:7-55:14			53:7-23	
Colleen O'Neill	12/17/2021	19:12-23				
		28:3-5				
		29:22-30:9			29:22-30:6	
		31:17-32:15			31:17-21	
		36:18-37:18			36:25-37:18	
		39:14-41:20			39:24-40:2	
		48:15-18				

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		49:10-13				
Charles Donoghue	11/16/2021	4:11-12				
		17:5-11				
		20:16-22:24				
		24:2-3				
		26:12-14				
		33:14-25				
		39:18-40:21	Relevance	This testimony is relevant because it shows the Watertown Police Department does not track complaints made against their officers.		
		47:13-22				
		53:12-55:18	Relevance after 53:15	The testimony is relevant because it shows that at the time of the incident the Watertown Police Department did not have any policies addressing the treatment of transgender individuals. It is also relevant because it shows that it was feasible for the Watertown Police		

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				Department to have such policies in place.		
		56:6-10			56:11-20	56:22-57:3
		56:22-60:12				
		63:7-24				
		64:22 –65:12			63:13-23	63:24
		67:4-9			67:10-70:8	
		85:12-17				
		104:12-105:7				
		116:4-7	Relevance	This testimony is relevant because it shows the Watertown Police Department's continued indifference to the rights of transgender people.		
		118:22-119:9				
		121:3-9				
George Cummings	12/9/2021	6:11-17				
		20:2-10				
		28:16-29:13	Relevance	The testimony is relevant because it shows Defendant Cummings's history of using excessive force against arrestees.		
		36:23-40:2			40: 3-14	40:15-42:8
		42:2-8				

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		42:16-22				
		42:23-48:2				
		48:23-24				
		49:2-50:6				
		50:18-25				
		55:12-20				
		73:4-9				
		79:18-80:13			80:14-81:8	81:9-19
		95:2-20			95:21-98:21	
		96:24-25; 97:14-98:23; 99:24	Duplicative of Counter- Designation	Plaintiff's designated testimony is not fully duplicative of Defendant's counter designation.		
		102:7-107:2				
		108:2-23				
		110:19-24; 112:8-10				
		128:9-15				
		138:16-24			138:25	
		139:15-140:4				
		143:18- 144:23			144:24- 145:24	146: 3-17
		146:18-147:2				
		148:3-150:9	Object to 148: 3-20	The testimony is relevant because it shows Defendant	150:10-19	150:20-151:8

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				Cummings's understanding of the allegations made in the complaint.		
		150:20-151:8				
		152:2-153:17				
		154:8-17	Relevance	The testimony is relevant because it shows the history of similar excessive force complaints made against Defendant Cummings.		
		157:9-160:18	Relevance	The testimony is relevant because it shows Defendant Cummings's history of using similar excessive force tactics against arrestees and his prior untruthfulness in how he presented the facts of the encounter upon investigation.		
		161:8-16	Relevance	The testimony is relevant because it provides context for the severity of the prior use of excessive force by Defendant Cummings.		
		167:2-11	Relevance	This testimony is relevant because it shows Defendant Cummings has a history of making derogatory comments about the LGBT		

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				community and is further relevant to the truthfulness of Defendant Cummings's denial of using similar derogatory language during his interactions with Ms. LeTray.		
		175:18-19; 178:7-179:10	Relevance	The testimony is relevant because it demonstrates Defendant Cummings's prior history of engaging in behaviors that grossly deviate from the standards of conduct for police officers.		
Samuel White	12/14/2021	5:11-17				
		13:2-6				
		16:11-18:18				
		21:12-18				
		22:18-24:25				
		25:10-26:15				
		30:21-31:7				
		41:16-42:3			42:4-12	42:13-17
		44:8-13			44:2-7	
		63:4-64:17			63:2-3	
		68:14-69:8			68: 3-14	
		69:21-25				

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		70:10-71:10				
		85:10-87:12				
		92:16-93:4				
		94:22-95:22				
		96:10-97:22				
		103:3-25				
		107:12-108:2	Relevance	The testimony is relevant because it shows that at the time of the incident the Watertown Police Department did not have policies addressing the treatment of transgender individuals. This testimony is also relevant because it shows City of Watertown's continued indifference to the rights of transgender people.		
		108:18-109:18			109:19-20	
		111:16-112:13	Relevance	The testimony is relevant because shows Defendant White did not receive training that addresses the treatment of transgender people from the City of Watertown. It is also relevant because it shows		

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				what Defendant White would have changed about his actions on the night of the incident.		
		112:14-116:10	Relevance	The testimony is relevant because it shows Defendant White was involved in a prior excessive force claim with Defendant Cummings.		

Dated: June 10, 2024  
 New York, New York

Respectfully submitted,

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